

REMARKS

Claims 1-11 remain pending in the application.

Claims 1-11 stand rejected as being unpatentable over Applicant's admitted prior art, Han, Inoue, Nishimura, Lorimer and Brunelli, in various combinations. Applicant respectfully requests reconsideration of such rejections. Actually, it is not clear if the Examiner is including Inoue amongst the cited references in that Inoue is not listed amongst the primary references cited against the claims. Rather, each reference to Inoue appears to be a typographical error in which the Examiner instead intended to reference Han. Regardless of whether Inoue is to be included amongst the cited references, applicant believes that the pending claims 1-11 are allowable over any and all combinations of the cited references.

Referring initially to claim 1, such recites a method for conditioning a surface of a polishing pad after chemical-mechanical polishing, which comprises exposing the pad surface to cleaning material that is entirely in the vapor phase and which comprises steam.

The Examiner cites Han for disclosing an apparatus configured to jet steam during conditioning of a pad. Applicant respectfully submits that the Examiner is misinterpreting Han. Specifically, Han is not disclosing an apparatus utilized for conditioning a surface of a polishing pad, but rather describes an apparatus utilized for cleaning a surface of a semiconductor substrate.. As is well known to persons of ordinary skill in the art, the considerations and conditions for cleaning surfaces of semiconductor substrates are completely different than those associated with conditioning of polishing pads. Accordingly, a person of ordinary skill in the art would not assume that methods utilized for

cleaning semiconductor substrates would have applicability for conditioning polishing pads.

Persons of ordinary skill in the art would thus not be motivated to incorporate Han's teachings of methodologies for cleaning semiconductor substrates into methodologies for conditioning polishing pads. Numerous methodologies are known which are of benefit for cleaning and processing of semiconductor wafers, but which are not applicable for conditioning of polishing pads. Thus, it is inappropriate to conclude that a methodology which Han discloses as having benefit for cleaning semiconductor wafers, would necessarily also be of benefit for conditioning polishing pads.


Han does not disclose or suggest methodology for conditioning polishing pad surfaces, and for the above-discussed reasons it would not be obvious to incorporate the methodologies of Han into processes for conditioning of polishing pad surfaces. As all of the Examiner's rejections of all of claims 1-11 are based upon incorporation of Han's methodology into processes for conditioning polishing pad surfaces, and as such incorporation is inappropriate for the reasons discussed above, it is believed that claims 1-11 are allowable over the cited references. Applicant therefore requests formal allowance of claims 1-11 in the Examiner's next action.

Dated: _____

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Respectfully submitted,

By: _____


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